EXHIBIT 2

Keith Dugger declares as follows:

- 1. I am over the age of 18 years. Each statement made in this declaration is based upon facts within my personal knowledge.
- 2. I reside in the State of Colorado and work for the Colorado Rockies professional baseball team as their Head Athletic Trainer. I joined the Rockies organization in 1992 and in 1997 earned Pacific Coast League's "Athletic Trainer of the Year" award. I became the assistant trainer for the Major League Baseball team Colorado Rockies in 1998, and was promoted to head trainer in November 2004, a position I have held up to the present. I have been a member of the Professional Baseball Athletic Trainers Society (also known as "PBATS") for over two decades, where I have also served on its Executive Committee.
- 3. As head trainer for the Colorado Rockies, my role includes doing everything I can to help the Rockies players, working hard to enhance workouts, reduce and prevent player injuries, improve player recoveries, just to name a few.
- 4. I have been familiar with Efraim Nathan / Lontex's products for over 15 years, and during that time I have seen him at least once each year each at the PBAT annual conference held in February, and usually once a year at spring training as well, in addition to phone calls with Mr. Nathan.
- 5. I have had my players consistently use Lontex's SWEAT IT OUT products because I have observed them to be very effective at rehabilitation, exercise, and recovery.
- 6. In these interactions consistently since at least prior to 2010, I have personally heard Efraim Nathan regularly refer to SWEAT IT OUT's stretch technology as the "COOL COMPRESSION" technology. His presentations at the PBATS annual conference, for example, always have him stretching his fabric in many directions and telling us that this "COOL COMPRESSION" technology is a stretches differently than the other products out there.

- 7. In my experience over these conversations with Mr. Nathan and in listening to his presentations since at least prior to 2010, Lontex's "COOL COMPRESSION" technology is the number one thing covered by Mr. Nathan, and in hearing him he has always referred to the "COOL COMPRESSION" technology by that name. I have always understood "COOL COMPRESSION" to mean the unique stretch that Lontex's garments have.
- 8. Attached as Exhibit A is a true and correct copy of an email with photographs that I took of a Lontex product and sent to Efraim Nathan as dated. These photographs show the care label of a Lontex garment, with text in blue ink. In my experience, this is how all care labels appeared on Lontex's compression garments since at least prior to 2010, with blue ink and including the phrase "COOL COMPRESSION," until the last couple years when the labels appeared in black ink, but still including with the phrase "COOL COMPRESSION."

Keith Dugger

EXHIBIT A

From: Dugger, Keith-CR

Sent: Tuesday, March 3, 2020 12:48 PM

To:sales@sweatitout.comSubject:Cool compression

Attachments: IMG_1101.jpg; ATT00001.txt; IMG_1102.JPG; ATT00002.txt; IMG_1103.JPG; ATT00003.txt;

IMG_1104.JPG; ATT00004.txt; IMG_1105.JPG; ATT00005.txt; IMG_1107.JPG; ATT00006.txt

Hi Efran, the following pictures are from my stock pile at Coors Field.

Doogie



KEITH DUGGER

HEAD ATHLETIC TRAINER

COORS FIELD | 2001 BLAKE STREET | DENVER, CO 80205 (303)312-2010 | KEITH.DUGGER@ROCKIES.COM



Visit our website at www.rockies.com for tickets and information.

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Alan>













We at SWEAT IT OUT* are specializing in Compression Shorts, Tights, and Shirts to help prevent injuries and also to help with rehabilitation of an injury.

Go to $\underline{www.sweatitout.com}$ and increase your knowledge and understanding about Compression before buying a known brand name that does not give you true compression.

Don't assume that all compression is the same!!! The stretch and recovery of the fabric used is the most important part of the Compression product. Most compression apparel will not help with injury and might cause you even greater pain and keep existing injuries from healing.



www.sweatitout.com

